

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

NICHOLAS J. WRIGHT, Plaintiff, v. RISTORANTE LA BUCA, INC., et al., Defendant(s).	Civil Action No. 2:18-cv-02207-MAK
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THE PARTIES' JOINT MOTION FOR APPROVAL OF SETTLEMENT

Plaintiff Nicholas J. Wright ("Plaintiff"), and Defendants Ristorante La Buca, Inc., Anthony Giuliani and Jeanie Giuliani ("Defendants" and together with Plaintiff, the "Parties") by and through their undersigned counsel, hereby jointly move this Honorable Court to grant the parties' joint motion to approve settlement. In support thereof, the Parties state:

1. On May 25, 2018, Plaintiff filed his initial complaint asserting federal and state wage and hour claims against Defendants. (Dkt. No. 1).
2. On October 26, 2018, the Court granted Plaintiff's motion for conditional certification of his federal claims pursuant to the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.*
3. Individuals Derek Leap ("Leap") and Matthew Rajczyk ("Rajczyk") (together, the "Opt-In Plaintiffs") filed consents to join the FLSA collection action.
4. On October 22, 2018, the Court granted in part Plaintiff's motion for summary judgment.
5. On March 21, 2019, the Parties participated in a settlement conference with Magistrate Judge Heffley, whereby they reached an amicable resolution of this matter.

6. The Parties have executed a Settlement Agreements, reflecting the terms of the resolution reached.

7. The Parties, and their respective attorneys, believe that the settlement reached is in the best interest of Plaintiff, Opt-In Plaintiffs and Defendants, and represents a fair, reasonable and adequate resolution of the claims asserted.

WHEREFORE, the Parties respectfully request that the Court grant the Joint Motion to Approve Settlement and enter the Order approving the Settlement attached as Exhibit 1 to the Settlement Agreement.

Date: March 27, 2019

Respectfully submitted,

/s/ Richard J. Giuliani

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